

REMARKS

The claim calls for a catalytic re-combiner. It is suggested that a finned heat exchanger somehow constitutes both a re-combiner and a catalytic re-combiner.

Clearly, it has no catalytic elements. The attempt to parse the definition of a catalytic re-combiner to simply say that it is anything that allows condensation is unjustified. All that a finned heat exchanger does is remove heat from the flowing fluid. There is no area specifically devoted to condensation and no basis to make such a claim.


Moreover, there is nothing that allows any recombination of gases using a catalytic material. Therefore, there is no catalytic re-combiner. Any heat exchanger is not a catalytic re-combiner. Assertions to the contrary are unsupported.

Certainly, even the present application shows heat exchangers, but still needs a catalytic re-combiner. Thus, there is no basis to assert equivalency between a heat exchanger and a catalytic re-combiner. The same can be said of the reference to Goodson. Namely, it teaches both elements, just no catalytic re-combiner within the integrated circuit package.

In view of the clear difference between a catalytic re-combiner and a heat exchanger, reconsideration is requested.

Respectfully submitted,

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